



CenturyLink™

March 17, 2011

EX PARTE NOTICE

Marlene Dortch
Secretary
Federal Communications Commission
445 12th Street, SW
Washington, D.C. 20554

John E. Benedict
Director
Federal Regulatory Affairs
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Suite 950
Washington, DC 20005
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Re: *Implementation of Section 224 of the Act*, WC Docket No. 07-245
A National Broadband Plan for our Future, GN Docket No. 09-51

Dear Ms. Dortch:

On behalf of CenturyLink, Jeff Lanning and I met yesterday with Al Lewis, Richard Kwiatkowski, Marcus Maher, and Marvin Sacks of the Wireline Competition Bureau's Pricing Policy Division. CenturyLink's Al Lubeck, Kathy Moisan, and Bill Radel participated by telephone.

CenturyLink described the inability of ILECs to secure reasonable rates, terms, and conditions for pole attachments, especially from electric utilities. CenturyLink reviewed its real-world experiences with the major types of attachment arrangements, and it explained that ILECs lack any meaningful leverage in dealing with electric utilities for attachments. CenturyLink described how joint use agreements, far from providing ILECs any meaningful benefits, have become disadvantageous to ILECs after years without negotiating leverage.

CenturyLink added that the FCC has legal authority and statutory direction to offer ILECs "just and reasonable" rates, competitive parity for pole attachments, and recourse for disputes. It also noted how excessive attachment rates discourage broadband deployment, discourage investment in network upgrades, and undermine competition.

The accompanying slide presentation was distributed at the meeting. Pursuant to Section 1.1206(b) of the Commission's rules, a copy of this electronic notice is being filed in each of the referenced dockets. Please contact me if you have questions about CenturyLink's submission.

Sincerely,

John E. Benedict

Attachment

cc: By Electronic Mail
Al Lewis
Richard Kwiatkowski
Marcus Maher
Marvin Sacks